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9 Attorneys for Plaintiffs
FATDOOR, INC., RAJ V. ABHYANKER

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 FATDOOR, INC., a Delaware corporation,
14 and RAJ ABHYANKER, an individual,

15 Plaintiffs,

16 vs.

17 NEXTDOOR.COM, INC., a Delaware
18 corporation,

19 Defendant.

Case No.

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

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23 Plaintiffs Fatdoor, Inc. and Raj Abhyanker allege the following:

24 **PARTIES, JURISDICTION AND VENUE**

25 1. Plaintiff FATDOOR, INC. is a Delaware corporation, with principal place of
26 business in Mountain View, California. Plaintiff Raj Abhyanker is an individual residing in
27 Cupertino, California.
28

1 2. Upon information and belief, NEXTDOOR.COM, INC. is a Delaware corporation
2 with its principal place of business at 110 SUTTER STREET, SUITE 700, SAN FRANCISCO,
3 CA 94104. Nextdoor has one or more offices in California and conducts business throughout the
4 State of California, including business conducted within this judicial district.

5 3. This action arises under the patent laws of the United States, 35 U.S.C. § 1 *et seq.*
6 This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

7 4. On information and belief, Defendant resides in this judicial district and/or
8 maintains continuous and systematic contacts with this judicial district; acts of infringement and
9 other events giving rise to Plaintiffs' claims asserted herein have occurred within this judicial
10 district; and Defendant offers to sell and/or sells goods or services that infringe the patents in suit
11 to consumers within this judicial district and/or otherwise engage in actions that infringe the
12 patents in suit within this judicial district. Defendant is therefore subject to jurisdiction within this
13 judicial district, and venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and
14 1400(b).

15 **INTRADISTRICT ASSIGNMENT**

16 5. This is an Intellectual Property Action to be assigned on a district-wide basis under
17 Civil L.R. 3-2(c) and 3-5.

18 **THE '091 PATENT**

19 6. Plaintiffs Abhyanker and Fatdoor each own a 50% interest in United States Patent
20 No. 8,732,091, entitled "SECURITY IN A GEO-SPATIAL ENVIRONMENT" and which was
21 duly issued on May 20, 2014 ("the '091 Patent"). A true and correct copy of the '091 Patent is
22 attached hereto as **Exhibit A** and is incorporated herein by reference.

23 **DEFENDANT'S ACTIVITIES**

24 7. Defendant is, without authorization from Plaintiffs, publishing and offering to the
25 public a neighborhood social networking website product and service through, among other
26 things, the internet domain name www.nextdoor.com, a domain name that was explicitly
27 disclosed as part of the application for the '091 patent application and in applications to which the
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1 '091 Patent claims priority, said disclosure occurring long before Defendant began to use that
2 same domain name to infringe the '091 Patent. Copies of selected screenshots from Defendant's
3 website are attached hereto as **Exhibit B** and incorporated herein by reference as an overview of
4 the methods employed and the products and services made, used, offered for sale and sold by the
5 Defendant, although the Defendant's infringing activities are not limited to those depicted in
6 **Exhibit B**. By making and using the www.nextdoor.com website and by making, using offering
7 to sell and/or selling the Defendant's goods or services of nextdoor.com, the Defendant has
8 infringed and continues to infringe one or more claims of the '091 Patent.

9
10 8. Defendant's acts of infringement described herein have caused and, unless
11 restrained and enjoined by this Court, will continue to cause Plaintiffs to suffer damages in an
12 amount to be proven at trial as well as further irreparable damage, loss, and injury for which
13 Plaintiff has no adequate remedy at law.

14 **CAUSE OF ACTION (Infringement of '091 Patent)**

15 9. Plaintiff repeats and realleges each and every allegation contained in Paragraphs
16 1-9 with the same force and effect as if set forth fully herein.

17 10. Defendant's actions described herein constitute direct infringement of the '091
18 Patent, in violation of 35 U.S.C. § 271(a).

19 11. Defendant's infringement of the '091 Patent has caused, and will continue to cause Plaintiff
20 to suffer damages in an amount to be proven at trial, for which Plaintiff is entitled to be compensated pursuant
21 to 35 U.S.C. § 284.

22 12. Plaintiff has suffered and continues to suffer irreparable injury resulting from Defendant's
23 infringement of the '091 Patent, for which Plaintiff has no adequate remedy at law.

24 13. On information and belief Defendant's infringement of the '091 Patent will continue, and the
25 Plaintiff will continue to suffer the resulting irreparable injury, unless and until such acts are restrained and
26 enjoined by this Court.

REQUEST FOR RELIEF

Wherefore, Plaintiff respectfully requests entry of judgment in its favor and against Defendant as follows:

- A. That Defendant has directly infringed the '091 Patent;
- B. That Defendant and its officers, agents, affiliates, parent and subsidiary corporations, employees, attorneys, and representatives, and all those acting in concert or participation with them, be preliminarily and permanently enjoined from making, using, offering for sale, and/or selling within the United States any method, product, service, website, or device that infringes any claim of the '091 Patent;
- C. That Plaintiff shall recover from Defendant damages adequate to compensate Plaintiff for infringement of the '091 Patent, pursuant to 35 U.S.C. § 284;
- D. That Plaintiff shall recover from Defendant its litigation expenses, including costs and reasonable attorneys' fees, pursuant to 35 U.S.C. § 285, and other applicable laws; and
- E. That Plaintiff has such other, further, or different relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Fed. R. Civ. P. 38 and Civil L.R. 3-6, Plaintiffs demand a jury trial on issues triable to a jury.

1 Dated: May 20, 2014

Respectfully submitted,

2 LEGALFORCE RAJ ABHYANKER, P.C.

3
4 By /s/ Scott J. Allen

5 Scott J. Allen
6 Nick Gerovac
7 Roy Montgomery
8 Bruno W. Tarabichi

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10 FATDOOR, INC. and Raj Abhyanker
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